

Corporate Environmental Programs General Electric Company 100 Woodlawn Avenue, Pittsfield, MA 01201

Transmitted Via Federal Express

June 2, 2000

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SITE: <u>GE-Howstonic</u>
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OTHER: 158798

Re: 2000 Consolidation Activities and Stormwater Drainage Improvements

Building 71 and Hill 78 On-Plant Consolidation Areas (GECD200)

GE-Pittsfield/Housatonic River Site

Dear Mr. Olson:

I. Introduction

This letter summarizes the construction activities to be conducted in 2000 by the General Electric Company (GE) relating to the Hill 78 and Building 71 On-Plant Consolidation Areas (OPCAs) in Pittsfield, Massachusetts. The activities expected to occur related to the OPCAs over the next several months include the consolidation of the currently stockpiled and covered materials generated in 1999, and the installation of a second stormwater basin to support future OPCA development. The remainder of this letter details these activities, and identifies the anticipated implementation schedule.

II. Consolidation Activities

As discussed in our May 10, 2000 letter to you, GE has recently consolidated approximately 1,935 cy of "non-regulated materials" (i.e., the non-TSCA materials that contain less than 50 ppm polychlorinated biphenyls [PCBs] and also do not constitute hazardous waste under EPA's RCRA regulations) that were temporarily stored within Buildings 33X and 65 (approximately 967 cy from each building) to the Hill 78 OPCA. These materials, generated as a result of the removal activities at the Upper ½-Mile Reach Removal Action, were consolidated over a four-day period from May 16 to May 19, 2000. The materials were consolidated on the southern portion of the Hill 78 OPCA, north of the existing access road. At the end of the consolidation activities, tarps were secured over the new materials, and perimeter erosion controls were re-established.

As you know, TSCA materials generated in 1999 (and for the Upper ½-Mile Reach Removal Action, through the early months of 2000) were not consolidated within the Building 71 OPCA, but have been placed in either a temporary stockpile located between the two OPCAs, or within Buildings 33X and 65. GE will transfer these materials to the Building 71 OPCA in accordance with the Detailed Work Plan for On-Plant Consolidation Areas (BBL, June 1999) (Work Plan) once EPA approves the addenda to the Work Plan, including GE's responses to EPA's April 27, 2000 comments on the August 12, 1999 Addendum to the Work Plan. (These responses will be submitted to EPA shortly under separate cover.)

In anticipation of transporting and consolidating the stockpiled materials into the Building 71 OPCA, GE has developed a Request for Proposal (RFP) document containing construction-related specifications and drawings. The RFP was distributed to prospective contractors on May 12, 2000, as part of the procurement



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process for selecting a remediation contractor to perform the construction activities. Attachment 1 to this letter contains pertinent sections of the RFP for your information.

II. Stormwater Management Facilities

In addition to the consolidation activities planned for this construction season, GE will implement the next phase of activities related to the on-site stormwater management system. These activities are necessary to effectively manage the stormwater runoff associated with the development of the OPCAs, and to improve the drainage conditions at the northwest corner of the General Dynamics parking lot. The construction activities generally include construction of a new stormwater basin (referred to as the 2000 stormwater basin), installation of a new pipeline to drain the 2000 stormwater basin into an existing storm sewer system, and redirecting the discharge point for several catch basins located in the General Dynamics parking lot to the 2000 stormwater basin.

The 2000 stormwater basin has been designed to attenuate the stormwater runoff from a large portion of the developed OPCAs (once fully developed), as well as the northwest corner of the General Dynamics parking lot, to a flow rate that can be conveyed by the existing storm sewer system. Runoff from a portion of the General Dynamics parking lot and the OPCAs will be directed into the 2000 stormwater basin forebay (located in the southeastern corner of the basin) to dissipate energy and distribute flow across the width of the basin. Collected stormwater will then be conveyed from the 2000 stormwater basin through a concrete outlet structure that is nearly identical in design to that used in the 1999 stormwater basin. A new stormwater basin outlet pipe will then convey the metered stormwater discharge from the outlet structure into a new manhole that will be installed over an existing 42-inch-diameter storm sewer pipe. The new stormwater basin inlet pipe will convey runoff collected by four General Dynamics parking lot catch basins into the 2000 stormwater basin. Currently, these catch basins discharge into an area that will be developed in the future as part of the OPCA development activities.

The enclosed design calculations (Attachment 2) summarize the methodology and the required design conditions for these stormwater management features. Consistent with the engineering design calculations for the 1999 stormwater basin and associated stormwater management structures, the attached calculations are based on peak hydraulic conditions associated with the 25-year, 24-hour storm event, and the anticipated final configuration of the OPCAs, as described in the Work Plan.

III. Anticipated Schedule

This letter provides a summary of the consolidation activities and stormwater drainage improvements planned for the Building 71 and Hill 78 OPCAs this construction season. As stated above, the contractor selection process for choosing a qualified remediation contractor to perform these activities was initiated on May 12, 2000. GE anticipates that final contractor selection will occur in June 2000, and that construction activities will commence thereafter, following EPA approval of the addenda to the Work Plan (including GE's responses to EPA's April 27, 2000 comments), as well as EPA's confirmation (requested in our May 10, 2000 letter) that GE is authorized to transfer leachate from the Building 71 OPCA to the Building 64G groundwater treatment facility for treatment. At this time, the consolidation activities and stormwater drainage improvements are anticipated to take three to four months.

Please contact me with any questions concerning this letter or the scope of the construction activities planned for the 2000 construction season.

Sincerely,

Andrew T. Silfer, P.E. Senior Technical Manager

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Attachments

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Tim Conway, Esq., EPA cc: Michael Nalipinski, EPA* Holly Inglis, EPA K.C. Mitkevicius, USACE Dawn Veilluex, Weston, Inc. Robert Bell, Esq., DEP J. Lyn Cutler, DEP* Alan Weinberg, DEP John Ziegler, DEP* Betsy Harper, Esq., MAAG Andrew Thomas, Jr., Esq., GE* Michael Carroll, GE John Novotny, P.E., GE* Mayor Gerald S. Doyle Michael Cartney, Pittsfield Generating Co.* Chris Bednar, General Dynamics* James Nuss, P.E., LSP, BBL* James Bieke, Esq., Shea & Gardner* Jeffrey Bernstein, Esq., Bernstein, Cushner & Kimmel* Public Information Repositories ECL 1-P-IV(A)(1)

(*w/attachments)